THE HONORABLE DAVID G. ESTUDILLO

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PAUL D. ETIENNE, et al., No. 3:25-cv-05461-DGE Plaintiffs,

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON

AT TACOMA

ROBERT W. FERGUSON, in his official capacity as Governor of Washington, et al.,

Defendants.

STIPULATED MOTION TO RE-NOTE PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION AND EXTEND DEADLINES **AND**

ORDER

NOTE ON MOTION CALENDAR: **JUNE 13, 2025**

Plaintiffs Paul D. Etienne, Joseph J. Tyson, Thomas A. Daly, Frank R. Schuster, Eusebio L. Elizondo, Gary F. Lazzeroni, Gary M. Zender, Robert Pearson, Lutakome Nsubuga, Jesús Mariscal, and Michael Kelly ("Plaintiffs") and Defendants Robert W. Ferguson, in his official capacity as Governor of Washington and Nicholas W. Brown, in his official capacity as Attorney General of Washington (collectively "State Defendants") jointly move the Court to re-note Plaintiffs' Motion for Preliminary Injunction (Dkt. 65) ("Motion") and to extend certain filing deadlines as set out below. The Parties request modest extensions to the current deadlines in light of the State Defendants' counsel's travel plans and other case commitments. The Parties' proposed deadline extensions will not alter the July 14, 2025 hearing date on Plaintiffs' Motion.

STIPULATED MOTION TO RE-NOTE MOT. FOR PRELIM. INJUNCTION AND EXTEND **DEADLINES**

(No. 3:25-cv-05461-DGE)

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FOR PRELIM. INJUNCTION AND EXTEND DEADLINES

STIPULATED MOTION TO RE-NOTE MOT.

(No. 3:25-cv-05461-DGE)

Specifically, the Parties request that the State Defendants' deadline to file and serve any opposition to Plaintiffs' Motion be extended from June 26, 2025, *see* Local Rule 7(d)(4), to June 30, 2025. The Parties likewise request that the Plaintiffs' deadline to file and serve any reply papers be extended from July 3, 2025, *id.*, to July 7, 2025. The Parties request that the Motion be re-noted from July 3, 2025 to July 7, 2025 to permit the extended briefing deadlines.

The Parties further request that State Defendants' deadline to respond to the Complaint be extended from June 27, 2025, which is 21 days after they were served with the summons and complaint, *see* Fed. R. Civ. P. 12(b)(a)(1)(A), to 21 days after the Court rules on Plaintiffs' Motion. The table below reflects the modest extensions requested by the Parties:

	Current Date	Amended Date
Noting Date for Plaintiffs'	July 3, 2025	July 7, 2025
Motion for Preliminary		
Injunction		
State Defendants' Deadline to	June 26, 2025	June 30, 2025
File and Serve Opposition to		
Plaintiffs' Motion for		
Preliminary Injunction		
Plaintiffs' Deadline to File	July 3, 2025	July 7, 2025
and Serve Reply Papers in		
Support of Motion for		
Preliminary Injunction		
State Defendants' Deadline to	June 27, 2025	21 days after Court rules on
Respond to Complaint		Plaintiffs' Motion.

IT IS SO STIPULATED by and between the Parties.

* * *

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1 I certify that this memorandum contains 370 words, in compliance with the Local Civil 2 Rules. 3 DATED: June 13, 2025 4 NICHOLAS W. BROWN By: /s/ William J. Crowley 5 William J. Crowley, WSBA # 18499 Attorney General CROWLEY LAW OFFICES, P.S. 6 By: /s/Alicia O. Young 600 University Street ALICIA O. YOUNG, WSBA 35553 **Suite 1708** 7 KELLY A. PARADIS, WSBA 47175 Seattle, WA 98101 8 EMMA GRUNBERG, WSBA 54659 Tel: (206) 224-7069 **Deputy Solicitors General** will@crowleylawoffices.com 9 1125 Washington Street SE PO Box 40100 Matthew T. Martens (pro hac vice) 10 Olympia, WA 98504-0100 Siddharth Velamoor, WSBA #40965 Alicia.Young@atg.wa.gov Donna Farag (pro hac vice) 11 Kelly.Paradis@atg.wa.gov Zachary Halpern (pro hac vice) 12 WILMER CUTLER PICKERING HALE AND Emma.Grunberg@atg.wa.gov 360-753-6200 DORR LLP 13 2100 Pennsylvania Avenue, NW Washington, DC 20037 Attorneys for Defendants Robert W. 14 Ferguson, Governor of Washington, and Tel: (202) 663-6000 Nicholas W. Brown, Attorney General of Fax: (202) 663-6363 15 Washington matthew.martens@wilmerhale.com 16 siddharth.velamoor@wilmerhale.com donna.farag@wilmerhale.com 17 zac.halpern@wilmerhale.com 18 Leah M. Fugere (pro hac vice) 19 WILMER CUTLER PICKERING HALE AND DORR LLP 20 350 South Grand Avenue **Suite 2400** 21 Los Angeles, CA 90071 Tel: (213) 443-5300 22 Fax: (213) 443-5400 leah.fugere@wilmerhale.com 23 24 Robert Kingsley Smith (pro hac vice) WILMER CUTLER PICKERING HALE AND 25 DORR LLP 60 State Street 26 STIPULATED MOTION TO RE-NOTE MOT. 27 **CROWLEY LAW OFFICES, P.S.** 600 University Street, Suite 1708 · Seattle, WA 98101 FOR PRELIM. INJUNCTION AND EXTEND (206) 209-0456 **DEADLINES** 28 www.crowleylawoffices.com (No. 3:25-cv-05461-DGE)

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ORDER

PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED.

The Court GRANTS the Stipulated Motion to Re-Note Plaintiffs' Motion for Preliminary Injunction (Dkt. 65) ("Motion") and to Extend Deadlines. The noting date for Plaintiffs' Motion and the Parties' filing deadlines shall be amended as follows:

	Current Date	Amended Date
Noting Date for Plaintiffs'	July 3, 2025	July 7, 2025
Motion for Preliminary		
Injunction		
State Defendants' Deadline to	June 26, 2025	June 30, 2025
File and Serve Opposition to		
Plaintiffs' Motion for		
Preliminary Injunction		
Plaintiffs' Deadline to File	July 3, 2025	July 7, 2025
and Serve Reply Papers in		
Support of Motion for		
Preliminary Injunction		
State Defendants' Deadline to	June 27, 2025	21 days after Court's ruling
Respond to Complaint		on Plaintiffs' Motion for
		Preliminary Injunction (Dkt.
		65)

IT IS SO ORDERED.

DATED this 16th day of June, 2025

David G. Estudillo United States District Judge

Presented by:

ORDER GRANTING
STIPULATED MOTION TO RE-NOTE MOT.
FOR PRELIM. INJUNCTION AND EXTEND
DEADLINES

(No. 3:25-cv-05461-DGE)

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	(No. 3:25-cv-05461-DGE)	

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